



PATRICK D. CROCKER
patrick@crockerlawfirm.com

February 26, 2009

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

Filed Electronically Via ECFS

RE: Voicenet Telephone, LLC
Customer Proprietary Network Information Certification
EB Docket No. 06-36

Dear Ms. Dortch:

Pursuant to 47 C.F.R. 64.2009(e) please find attached the 2008 Annual CPNI Certification and Accompanying Statement filed on behalf of Voicenet Telephone, LLC.

Please contact the undersigned should you have any questions or concerns at (269) 381-8893 or patrick@crockerlawfirm.com.

Very truly yours,

CROCKER & CROCKER, P.C.


Patrick D. Crocker

PDC/tld

cc: FCC Enforcement Bureau (2 copies via USPS Mail)
Best Copy and Print, Inc. (via e-mail FCC@BCPIWEB.COM)

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 27, 2009

Name of Company Covered by this Certification: Voicenet Telephone, LLC

Form 499 Filer ID: 824454

Name of Signatory: Cathy Burger-Gray

Title of Signatory: Managing Member

I am the Managing Member of Voicenet Telephone, LLC and as such do hereby certify, affirm, depose, and say that I have authority to make this Customer Proprietary Network Information ("CPNI") Annual Certification of Compliance on behalf of Voicenet Telephone, LLC. I have personal knowledge that Voicenet Telephone, LLC has established adequate operating procedures to ensure compliance with the Commission's CPNI rules as set forth in 47 C.F.R. § 64.2001 et. seq.

Attached to this Certification is an Accompanying Statement explaining how the company's procedures ensure compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

Voicenet Telephone, LLC received no customer complaints in the past year concerning the unauthorized release of CPNI. Further, Voicenet Telephone, LLC has taken no action against data brokers for the unauthorized release of CPNI during calendar year 2008. Voicenet Telephone, LLC will report any information it may obtain with respect to the processes pretexters are using to attempt to access CPNI and what steps Voicenet Telephone, LLC is taking to protect CPNI.

This certification is dated this 25 day of February, 2009.



Cathy Burger-Gray
Managing Member
Voicenet Telephone, LLC

Accompanying Statement to Annual CPNI Compliance Certification for VOICENET TELEPHONE, LLC

VOICENET TELEPHONE, LLC ("VOICENET") operating procedures ensure that VOICENET is in compliance with 47 C.F.R. Part 64, Subpart U, as follows:

Employee Training and Discipline

- VOICENET requires all employees as well as, contractors and agents (if applicable) with access to CPNI to sign a Statement of CPNI Acknowledgement, stating that they are to protect the confidentiality of the CPNI and that they are prohibited to use the CPNI information for any purpose other than addressing customer inquiries or for other internal matters that are NOT related to marketing efforts. Failure to follow the Statement may result in disciplinary action or termination of their employment.

Sales and Marketing Campaigns

- VOICENET requires management approval for any and all sales and marketing campaigns to ensure that CPNI is not used.
- VOICENET does not sell or license CPNI from its product service offerings for third party marketing campaigns.
- VOICENET ensures that agreements entered into with third party service providers that store CPNI include verbiage that acknowledges such CPNI is VOICENET's proprietary information and that the service provider is prohibited to use such information for solicitation or for any other purpose outside the terms of the agreement.

Record-Keeping Requirements

- VOICENET does not store CPNI records in its internally maintained databases.
- VOICENET requires that CPNI records maintained by third party service providers are being maintained for a minimum of one (1) year.

Establishment of a Supervisory Review Process

- VOICENET establishes a supervisory review process for all outbound marketing situations to ensure no CPNI records are being utilized.

Opt-In

- VOICENET does not market CPNI. However, if VOICENET was to market CPNI it would only disclose CPNI to sales agents, affiliates, joint venture partners, independent contractors or to any other third parties after receiving "opt-in" approval from a customer.
- VOICENET enters into confidentiality agreements with joint venture partners, independent contractors or any other third party when releasing or storing CPNI. All such confidentiality agreements are reviewed by management for compliance with this Policy.

Opt-Out Mechanism Failure

- VOICENET will not market CPNI. However, if VOICENET was to market CPNI it would establish a protocol requiring written notice to the FCC within five (5) business days of any instance where opt-out mechanisms did not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.

Compliance Certificates

- VOICENET executes a statement, signed by an officer, certifying that he or she has personal knowledge that VOICENET has established operating procedures that are adequate to ensure compliance with the FCC's CPNI regulations.
- VOICENET prepares an Accompanying Statement detailing how operating procedures ensure compliance with CPNI regulations.
- VOICENET provides, if applicable, an explanation of any actions taken against data brokers.
- VOICENET provides, if applicable, a summary of all customer complaints received in the past year concerning unauthorized release of CPNI.

Customer Notification of CPNI Changes

- VOICENET only make changes to CPNI upon a customer's request.
- Customers do not have access to CPNI information on-line. However, customers may access and modify their CPNI information by contacting our customer service center.

Notification to Law Enforcement and Customers of Unauthorized Access

- VOICENET notifies the appropriate law enforcement agency of any unauthorized access to a customer's CPNI.
- VOICENET ensures that all records of any discovered CPNI breaches are kept for a minimum of two (2) years.

STATEMENT OF ACTIONS TAKEN AGAINST DATA BROKERS

- A. During Calendar Year 2008, the Company has instituted the following proceeding, or filed the following petitions, against data brokers before the Federal Communications Commission:

NONE

- B. During Calendar Year 2008, the Company has instituted the following proceeding, or filed the following petitions, against data brokers before the various Public Utilities Commissions:

NONE

- C. During Calendar Year 2008, the Company has instituted the following proceeding, or filed the following petitions, against data brokers before the following federal or state courts:

NONE

**SUMMARY OF CUSTOMER COMPLAINTS
REGARDING UNAUTHORIZED RELEASE OF CPNI**

- A. During Calendar Year 2008, the Company has received the following number of customer complaints related to unauthorized access to, or disclosure of, CPNI due to improper access by Company employees:

NONE

- B. During Calendar Year 2008, the Company has received the following number of customer complaints related to unauthorized access to, or disclosure of, CPNI due to improper disclosure to individuals not authorized to receive the information:

NONE

- C. During Calendar Year 2008, the Company has received the following number of customer complaints related to unauthorized access to, or disclosure of, CPNI due to improper access to online information by individuals not authorized to view the information:

NONE

- D. During Calendar Year 2008, the Company has become aware of the following processes that pretexters are using to attempt to access its CPNI:

NONE